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 GOODLEAP LLC

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

CHUCK ROWLETT,

Plaintiff,

v.

GOODLEAP, LLC; DOE DEFENDANTS I  
 THROUGH X; AND ROE CORPORATIONS  
 I THROUGH X,

Defendants.

Case No. 2:24-cv-01524-APG-MDC

**STIPULATION AND REQUEST FOR  
 ORDER EXTENDING TIME FOR  
 DEFENDANT GOODLEAP, LLC TO  
 RESPOND TO PLAINTIFF CHUCK  
 ROWLETT'S COMPLAINT**

**[SECOND REQUEST]**

Complaint Filed: July 26, 2024

Defendant GOODLEAP, LLC, ("GoodLeap") and Plaintiff CHUCK ROWLETT  
 ("Plaintiff"), by and through their respective attorneys of record, stipulate and agree to extend the  
 deadline for GoodLeap to file a responsive pleading to Plaintiff's Complaint [ECF No. 1-3 (state  
 complaint)] to September 24, 2024. This is the Parties' second request to extend the deadline to  
 respond to the Complaint.

1. On July 26, 2024, Plaintiff CHUCK ROWLETT ("Plaintiff") filed this action in  
 the Eighth Judicial District in Clark County, State of Nevada, entitled *Rowlett v. GoodLeap, LLC*,  
 which was assigned case number A-24-898447-C.

2. The Summons and the Complaint were served upon GoodLeap, LLC's registered  
 agent on July 31, 2024.

3. On August 20, 2024, GoodLeap removed the action from the Eighth Judicial

1 District Court to this Court, contending this Court has subject matter jurisdiction over this action  
2 pursuant to 28 U.S.C. § 1331, as GoodLeap contends the Complaint alleges a federal claim under  
3 the Truth-in-Lending Act (15 U.S.C. § 1631, *et seq.*). As a result, pursuant to Federal Rule of  
4 Civil Procedure 81(c)(2), GoodLeap's current deadline to file a responsive pleading is August 27,  
5 2024.

6 4. On August 26, 2024, GoodLeap requested Plaintiff to extend the deadline to  
7 respond to the Complaint to September 10, 2024. Part of the reason GoodLeap requested the  
8 extension was to discuss the allegations contained in Plaintiff's Complaint and to determine if  
9 early resolution is possible. That same day, Plaintiff agreed to the requested extension.

10 5. Accordingly, on August 28, 2024, the Parties submitted a stipulation to this Court  
11 to extend the deadline for GoodLeap to file a responsive pleading to Plaintiff's Complaint [ECF  
12 No. 1-3 (state complaint)] to September 10, 2024. (ECF No. 8) On August 30, 2024, the Court  
13 granted the stipulation. (ECF No. 8.)

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6. Since then, the Parties have been engaged in settlement negotiations and are hopeful to reach a settlement within in the next two weeks. Accordingly, the Parties have again stipulated to extend the deadline for GoodLeap to respond to Plaintiff's Complaint for another two weeks to September 24, 2024. Should the Parties reach a tentative settlement before September 24, 2024, the Parties will promptly submit a notice of settlement to the Court. This stipulation is being submitted in good faith and not for purposes of delay.

IT IS SO STIPULATED.

Dated: September 17, 2024

ROPERS MAJESKI PC

By: /s/ Timothy J. Lepore  
TIMOTHY J. LEPORE  
Attorneys for Defendant  
GOODLEAP LLC

Dated: September 17, 2024

LAW OFFICES OF MILES N. CLARK, LLC

By: /s/ Miles N. Clark  
MILES N. CLARK  
Attorneys for Plaintiff  
CHUCK ROWLETT

IT IS SO ORDERED

UNITED STATES MAGISTRATE JUDGE

DATED: 09-18-24

**CERTIFICATE OF SERVICE**

I certify that on September 17, 2024, I served the foregoing **STIPULATION AND REQUEST FOR ORDER EXTENDING TIME FOR DEFENDANT GOODLEAP, LLC TO RESPOND TO PLAINTIFF CHUCK ROWLETT'S COMPLAINT** to be filed via the Court's CM/ECF system, which will accomplish service on all parties of record through their counsel.

/s/ Stephanie Hart  
Stephanie Hart